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Hearing Date: April 29, 2015  
Hearing Time: 10 AM (EST)  
Objection Deadline: March 18, 2015

*Attorneys for customers set forth  
On Exhibit A to the Chaitman Declaration*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:  
SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SE-  
CURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)  
SIPA Liquidation  
(Substantively Consolidated)

In re:  
BERNARD L. MADOFF,

Debtor.

**DECLARATION OF HELEN DAVIS CHAITMAN, ESQ.**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner with Becker & Poliakoff LLP (“B&P”), counsel to the BLMIS customers listed on **Exhibit A**.

2. Attached hereto as **Exhibit B** is a true and correct copy of Aaron Blecker’s Second Set of Document Demands to the Trustee (“Document Demands”).

3. Attached hereto as **Exhibit C** is a true and correct copy of Aaron Blecker's First Set of Interrogatories to the Trustee ("Interrogatories").

4. Attached hereto as **Exhibit D** is a true and correct copy of the Trustee's Responses and Objections to the Document Demands.

5. Attached hereto as **Exhibit E** is a true and correct copy of Trustee's Responses and Objections to the Interrogatories.

Dated: March 18, 2015  
New York, New York

/s/ Helen Davis Chaitman